

From: Mia, Marcia
Sent: Monday, July 02, 2018 01:11 PM
To: Ostrand, Laurie
CC: North, Alexis; Wilwerding, Joseph
Subject: RE: Fugitive equipment requirements for MACT HH

Are we sure this is a new source?

We have already told her MACT HH doesn't exempt 0000a. She seems to agree to that reading. It doesn't matter if the requirements are the same, which is what she is hung up on. It is just the plain reading, and we cannot go beyond that.

I would say:

Ex. 5 Deliberative Process (DP)

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

From: Ostrand, Laurie
Sent: Friday, June 29, 2018 9:09 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>
Subject: FW: Fugitive equipment requirements for MACT HH

Hi Marcia

I propose to send Carissa the following. Any feedback?

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Carissa Money - CDPHE [mailto:carissa.money@state.co.us]

Sent: Thursday, June 28, 2018 3:24 PM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Cc: North, Alexis <North.Alexis@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Subject: Re: Fugitive equipment requirements for MACT HH

Laurie,

I agree that MACT HH doesn't reference NSPS 0000a. I'm struggling because the fugitive equipment requirements for a gas processing plant appear to be identical between NSPS 0000 and NSPS 0000a. For example, I don't readily see any differences between the fugitive requirements in 40 CFR 60.5400 and 60.5401 and the requirements in 40 CFR 60.5400(a) and 60.5401(a). I would like to make sure I'm understanding the requirements correctly. So, even though the requirements appear to be identical for a gas plant, a newer gas plant subject to NSPS 0000a would still have to be subject to MACT HH fugitive requirements even though an "older" plant subject to NSPS 0000 would be exempt?

The application I'm reviewing is for a new train at an existing gas plant. The existing trains are subject to NSPS 0000 for fugitives and thus exempt from MACT HH fugitives. However, the new proposed train would be subject to fugitive requirements under NSPS 0000a and MACT HH even though both trains are following identical requirements. Is that correct? Are there more stringent standards for fugitives at gas plants under NSPS 0000 than NSPS 0000a?

Thanks,

Carissa Money

Oil and Gas Permit Engineer

4300 Cherry Creek Drive South, Denver, CO 80246-1530

office: 303.692.3229

email: carissa.money@state.co.us

On Thu, Jun 28, 2018 at 2:58 PM Ostrand, Laurie <Ostrand.Laurie@epa.gov> wrote:

Hi Carissa

MACT HH indicates, at 40 C.F.R. 63.679(b), that 63.679 does not apply to ancillary equipment and compressors for which a source is subject to and controlled under 40 C.F.R. part 60, Subpart OOOO.

40 C.F.R. 63.679(b) does not reference Subpart OOOOa. Therefore, OOOOa equipment would be subject to MACT HH requirements.

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

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From: Carissa Money - CDPHE [mailto:carissa.money@state.co.us]

Sent: Thursday, June 28, 2018 2:45 PM

To: North, Alexis <North.Alexis@epa.gov>

Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: Re: Fugitive equipment requirements for MACT HH

Alex and Laurie,

Thank you for the quick reply. I don't know if you could shed a little more light. When you say there would still be NSPS 0000a applicability, do you mean similar to NSPS 0000 where there are reporting requirements? Or would there be additional applicable requirements under MACT HH for ancillary equipment subject to NSPS 0000a?

Thanks again!

Carissa Money

Oil and Gas Permit Engineer

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On Wed, Jun 27, 2018 at 12:49 PM North, Alexis <North.Alexis@epa.gov> wrote:

Hi Carissa,

In a strict reading of NSPS 0000a there is nothing that exempts ancillary equipment.

We checked with our headquarters folks and they are sure that there will still be NSPS 0000a applicability.

I'm cc'ing Laurie Ostrand on this as she was instrumental in getting this answer for you.

Thanks,

Alex

Alexis North, Environmental Scientist

Office of Enforcement, Compliance & Environmental Justice

EPA Region 8

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Phone: 303-312-7005

Email: north.alexis@epa.gov

From: Carissa Money - CDPHE [mailto:carissa.money@state.co.us]

Sent: Tuesday, June 26, 2018 6:38 AM

To: North, Alexis <North.Alexis@epa.gov>

Subject: Fugitive equipment requirements for MACT HH

Hi Alex,

I'm working on a permit application for a new gas plant in Colorado. Fugitive components at the gas plant will be subject to NSPS 0000a. The plant will also be major for HAPs and thus, the fugitive components will also be subject to MACT HH. Currently, MACT HH exempts ancillary equipment and compressors subject to NSPS 0000 (63.769(b)). Is fugitive equipment subject to NSPS 0000a also exempt from MACT HH?

Thank you for your help,

Carissa Money

Oil and Gas Permit Engineer

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